

AO 91 (Rev. 11/11) Criminal Complaint

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UNITED STATES DISTRICT COURT

for the

Eastern District of Michigan

United States of America

v.

Felipe Dominguez-Mejia

Case: 2:17-mj-30375
Assigned To : Unassigned
Assign. Date : 8/1/2017
Description: RE: FELIPE
DOMINGUEZ-MEJIA (EOB)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of January 2015 through August 1, 2017 in the county of Wayne and elsewhere in the
Eastern District of Michigan, the defendant(s) violated:

Code Section

Offense Description

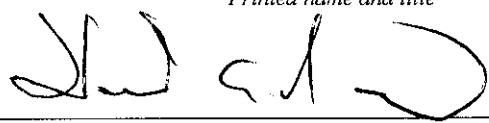
18 U.S.C. § 2251(a) and (e), 18 U.S.C. § 2252A(a)
(2)(A) and (b)(1) and 2252A(a)(5)(B) and (b)(2);
18 U.S.C. § 2422; 2252A(g)Producing, attempting to produce and conspiracy to produce child
pornography; conspiracy to receive child pornography; conspiracy to access
with intent to view child pornography; coercion and enticement of a minor;
participating in a child pornography enterprise.

This criminal complaint is based on these facts:

See Attached Affidavit

FILED
AUG 01 2017
CLERK'S OFFICE
U.S. DISTRICT COURT☒ Continued on the attached sheet.

Sworn to before me and signed in my presence.

Date: 8/1/17City and state: Detroit, Michigan
Complainant's signatureSpecial Agent Adam Christensen, FBI
Printed name and title
Judge's signatureHon. David R. Grand, U.S. Magistrate Judge
Printed name and title

AFFIDAVIT IN SUPPORT OF APPLICATION FOR COMPLAINT AND
ARREST WARRANT

I. INTRODUCTION

I, Adam Christensen, having been first duly sworn, do hereby depose and state as follows:

1. I have been employed as a Special Agent of the FBI since 2010, and am currently assigned to the Detroit Division. While employed by the FBI, I have investigated federal criminal violations related to child exploitation, and child pornography. I have gained experience through training and everyday work relating to conducting these types of investigations. I have received training in the area of child pornography and child exploitation, and have had the opportunity to observe and review numerous examples of child pornography (as defined in 18 U.S.C. § 2256) in all forms of media including computer media. Moreover, I am a federal law enforcement officer who is engaged in enforcing the criminal laws, including 18 U.S.C. §§ 2251 and 2252A, and I am authorized by the Attorney General to request an arrest warrant.

2. This affidavit is made in support of an application for a criminal complaint and arrest warrant for **Felipe DOMINGUEZ** (XX/XX/1986) for violations of 18 U.S.C. § 2251(a) and (e) (producing, attempting to produce, and conspiracy to

produce child pornography); 18 U.S.C. § 2252A(a)(2)(A) and (b)(1) (conspiracy to receive and distribute child pornography); 18 U.S.C. § 2252A(a)(5)(B) and (b)(2) (conspiracy to access with intent to view child pornography); 18 U.S.C. § 2422 (coercion and enticement); and § 2252A(g)(2) (participating in a child pornography enterprise).

3. The statements contained in this affidavit are based in part on: information provided by FBI Special Agents; written reports about this and other investigations that I have received, directly or indirectly, from other law enforcement agents, information gathered from the service of administrative subpoenas; the results of physical and electronic surveillance conducted by law enforcement agents; independent investigation and analysis by FBI agents/analysts and computer forensic professionals; and my experience, training and background as a Special Agent (SA) with the FBI. Because this affidavit is being submitted for the limited purpose of securing authorization for the requested arrest warrant, I have not included every fact known to me concerning this investigation. Instead, I have set forth only the facts that I believe are necessary to establish the necessary probable cause that **DOMINGUEZ** has violated Title 18 U.S.C. §§ 2251(a) and (c), 2252A(a)(2)(A) and (b)(1), 2252A(a)(5)(B) and (b)(2), 2422 and 2252A(g)(2).

Background of Investigation

4. This affidavit, complaint, and arrest warrant are part of an ongoing investigation related to the sexual exploitation of children (specifically teenage girls) on a chatroom-based website. To protect the integrity of the investigation, the website will be referred to throughout this affidavit as Website A.

5. The investigation reveals that Website A is primarily used by adult men seeking to sexually exploit teenage girls. These men pretend to be teenage boys, teenage girls, or others to entice the victims to engage in sexually explicit activity on camera during live-streaming chats. Throughout the course of this investigation, the FBI has identified more than 50 minor victims, with dozens more yet unidentified, who remove clothing, engage in sexual activity, and otherwise pose for other users on the various chatrooms on Website A. The investigation also reveals that in many instances groups of users on Website A work together to coordinate the recruitment, enticement, and coercion of the victims into producing child pornography.

6. On April 10, 2017, the FBI executed a federal search warrant related to this investigation. The target of that search warrant, hereinafter referred to as S3, agreed to speak to law enforcement after the search warrant execution. S3 stated that he was part of a group that enticed minor females to undress, masturbate, and engage

in other types of sexual activity on webcam on Website A.¹ Members of the group usually record these sexual acts and share the recordings with other group members.

7. According to S3, the group typically organized and communicated through an invitation-only Skype group chat. However, at different times, they have also used chatrooms on Website A and other websites to organize and discuss their scheme. Members of S3's group played different roles in order to accomplish the common objective of getting minor females to engage in masturbation and other sexually explicit conduct via webcam so that they could record it. According to S3, their targets were primarily 14 to 18 year-old females.

8. S3 also told the FBI that the Skype group used Website B—a website similar to Website A that likewise involved group chatrooms where users could appear live on webcam to live stream to other users in the chatroom—as part of their sexually exploitive conspiracy. According to S3, when Website B was active it was password protected and exclusively used by members of his Skype group, and was used by them to target minor females in order to entice them to engage in sexual activity on camera. Website B ceased operations in August 2015.

9. S3 provided Affiant with permission to assume his identity in the Skype group chats. A review of historical Skype chats between S3 and other members of the

¹ The FBI knows the identities of S3, Website A, Website B, and the usernames utilized by the

Skype group corroborated S3's statements about group-related activity on Website A and Website B. Moreover, Skype chats between S3 and other Skype group members demonstrated that the group's conspiracy to sexually exploit minor victims on Website A continued throughout 2015, 2016, and up to at least April 2017.

10. Besides information provided by S3, the FBI also has obtained login information from Website A and Website B. The logs show the IP addresses used by particular users and the chatrooms those IP addresses logged into.

Specific Examples of Child Exploitation on Website A and Website B

11. Based on my review of the Skype group's chats, there are several specific examples of the Skype group coercing teenage girls into engaging in sexually explicit conduct on Website A and discussing the recordings they made of them. They include the following:

- On October 23, 2016, a Skype group member said, "ffs [MV-13's name] file is 3GB." **SHELDON**² replied, ":o interesting hehe i thought for sure we lost her to [website name]." Later, **SHELDON** asked which room MV-13 was in and another group member responded by identifying a known chatroom on Website A. On November 4, 2016, the Skype group discussed MV-13 again. A member

defendants, but they are not revealed here to protect the integrity of an ongoing investigation.

² This Skype account user was referred to as **SHELDON** by other group members, so that name rather than his full Skype account name, is revealed here.

said, in reference to MV-13, “that’s the girl we got like 2 weeks ago who’s grounded and can only cam when she’s at her dads.”

- Throughout the Skype chats, the group regularly discussed MV-8, a minor born in 2000. On April 21, 2016, one Skype group member told the group, “[MV-8] is on ... lol and already bating.” He then told other group members the name of the chatroom on Website A that MV-8 was using. Another user later said “i capped it with sound if you want ityes if you are capping this :P”. Based on this investigation and previous investigations into Website A, I know that “bate” is shorthand for masturbation and cap is shorthand for “capturing” or recording the sexual activity. A forensic examination of S3’s devices revealed numerous videos of MV-8 masturbating on camera that appear to be recorded from Website A.
- On November 21, 2016, the group made several comments about MV-8’s prior sexually explicit activity, writing: “damn I wish all girls were like MV-8 . . . 0 drama”; “MV-8 used her toy today”; “oh the vibrating bullet?”; “we might have to give [MV-8] an entirely new room before she leaves because that guy might have seen the link.”
- On February 17, 2017, S3 wrote to the group “I dropped [victim’s name] in the folder” adding “its long with quick bate at the end.” Two Skype group members

(including **SHELDON**) each wrote “thanks” in response. S3 later wrote that he mislabeled the video with the wrong victim’s name, and other members showed disappointment that it was not the first victim mentioned by S3. Based on this investigation, I know that “dropped” is shorthand for posting a video into a file sharing program.

- On March 9, 2017, a Skype group member wrote about the age of one girl, “idc tbh she looks like she is 10 with no boobs.”

Your affiant’s review of the Skype group’s chats showed that most of the discussion centered on the sexual exploitation of the minor victims of the group, consistent with the examples provided above. The user **SHELDON** was a consistent contributor to the Skype group.

12. Similarly, the Skype group used Website B to sexually exploit minor victims. For example, MV-16 resides in the Eastern District of Michigan but she has not yet been interviewed. Logs from Website B reveal that MV-16 was regularly on that website during the summer of 2015. On multiple occasions, members of the Skype group encouraged and requested MV-16 to remove her clothing while on camera. On August 12, 2015, for example, users on Website B including **SHELDON** and others directed MV-16 to remove her clothing and engage in sexual activity while on camera. A portion of that conversation is as follows:

SHELDON: damn i wanna spread those legs and lick you real good
D5: damn I love that cameltoe
D5: fuck
SHELDON: now download shorts
D6: spanking that ass must be fun
D1: dam just need to open those legs up
D5: open boobs [MV-16]
SHELDON: open them good
SHELDON: lets see the beautiful baby feeders
SHELDON: (nod)
D6: get them twins out
D5: free your nipples
SHELDON: let the meet the rest of the world
D5: mmm rub your inner tights
SHELDON: mmm pull the shorts up
MV-16: lol
SHELDON: yes
SHELDON: like that
D6: now shortless :P
SHELDON: keep doing it
SHELDON: make your body feel alive
SHELDON: inner thighs tho
D6: (happy)
SHELDON: get one leg up
SHELDON: and caress like there is no tomorrow
MV-16: hajaja
SHELDON: close to your beautiful sexy kitty
D6: (nod)
SHELDON: (nod)
D6: need a wet [MV-16]
SHELDON: just download them small pants
SHELDON: more
SHELDON: more of that money maker
SHELDON: stick that sexy ass up [MV-16]
D1: mmmmmmmmmmmmmmmmm that ass looks so yummy just needs
to be turned to the cam
SHELDON: pull teh short up a little more

SHELDON: the*
SHELDON: with your hand pull it up
D5: lower ur cam [MV-16]
SHELDON: that too
D1: push it up in he air
SHELDON: we need more of that sexy ass
SHELDON: it looks so fuckable
D6: yeah, bring that ass closer
SHELDON: i wanna fuck you in doggy style pull your hair with one hand as isoank you with teh other so hard that i will leave a handprint
SHELDON: lower the cam
SHELDON: lets see more of your sexy ass

The logs then show that MV-16 left the room. On June 21, 2015, MV-16 told the users in the room (which included multiple user names known to be associated with the Skype group) that she was in the ninth grade.

The FBI has identified at least 15 victims of the Skype group from Website A and Website B. Of those victims, MV-1, MV-2, MV-12, MV-13, MV-14, MV-16, and MV-17 all reside in the Eastern District of Michigan.

Identifying Sheldon as DOMINGUEZ

13. The FBI searched the logs from Website A and Website B for IP addresses used by the user **SHELDON** or **KEEGAN** (a known alias used by **SHELDON**). IP addresses found in the logs for both websites resolved back to AT&T Internet Services and they in turn responded to a subpoena by identifying the subscriber of that IP

address as a person with the last name Dominguez in a residence on Pleasant Street in Springdale, Arkansas.

14. The FBI checked open source information about the residents of the apartment on Pleasant Street in Springdale, Arkansas, one of whom was Felipe **DOMINGUEZ** born in 1986. A review of the Skype conversations between **SHELDON** and other members of the Skype group showed at least one occasion where **SHELDON** identified himself as being from Arkansas, and another time where he made reference to his “senior year” being in 2004.

Search Warrant Execution

15. Based on all of this information (and more), the FBI obtained a search warrant for the residence on Pleasant Street in Springdale, Arkansas. Today, a federal search warrant was executed in the Western District of Arkansas at this residence. **Felipe DOMINGUEZ** was present during the execution of the warrant. Dominguez voluntarily spoke with the agents and made the following admissions:

- a. **DOMINGUEZ** admitted to being **SHELDON** on Skype and Website A;
- b. **DOMINGUEZ** admitted to living at the residence, and pointed agents to his room where computing devices were located;
- c. **DOMINGUEZ** admitted to being a member of a group that gets girls to engage in sexual activity on webcam on Website A;

d. **DOMINGUEZ** identified some of the other members of the Skype group;

e. **DOMINGUEZ** admitted to having hundreds of child pornography videos.

16. As indicated above, **DOMINGUEZ** identified his computing devices. On those devices agents observed several child pornographic files.

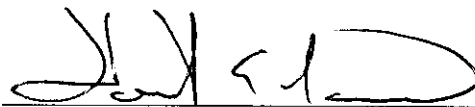
Conclusion

17. Based on the foregoing, there is probable cause to believe **DOMINGUEZ** has produced, attempted to produce, and conspired to produce child pornography in violation of 18 U.S.C. § 2251(a) and (e) and conspired to receive and access with intent to view child pornography, in violation of 2252A(a)(2)(A) and (b)(1), 2252A(a)(5)(B) and (b)(2). Moreover, there is probable cause that **DOMINGUEZ** has coerced and enticed, or attempted to coerce and entice, a minor to engage in sexually explicit conduct, in violation of 18 U.S.C. § 2422; and has participated in a child pornography enterprise, in violation of 18 U.S.C. § 2252A(g)(2).



Special Agent Adam Christensen
Federal Bureau of Investigation

Sworn to me this 1st day of August, 2017



David R. Grand
United States Magistrate Judge